

II. REMARKS

Reconsideration and allowance of the subject application are respectfully requested.

Claims 1, 4-26, 28-52, 54-64, and 66-95 remain pending in the subject application. Claims 1, 23, 42, 51, 56, 62, 68, 74, 79, and 85 are independent. In this Amendment, Claims 1, 23, 42, 51, 56, 62, 68, 74, 79, and 85 have been amended.

In the Examiner's reasons set forth in the Advisory Action dated August 8, 2007, the Examiner has maintained the rejection of the claims primarily on the basis of Japanese Published Application No. 09-224111 to Ishikawa either alone or in combination with Japanese Published Application No. 08-108689 to Komori, U.S. Patent No. 5,790,910 to Haskin, U.S. Patent No. 6,663,328 to Byrd et al., U.S. Patent No. 6,570,612 to Saund et al. and/or U.S. Patent No. 6,567,121 to Kuno. Applicants respectfully submit that the Examiner's rejections in view of the cited references should be withdrawn.

The primary reference (Ishikawa) relied upon by the Examiner shows an electronic blackboard comprising an image sensor that captures images of a writing surface. Each channel of the image sensor is processed differently. The red channel of the image sensor is processed using a character discriminator, the green channel of the image sensor is processed using a straight line discriminator and the blue channel of the image sensor is processed using an arbitrary graphics discriminator. Ishikawa thus discriminates between characters, straight lines and graphics so that they can be

recognized separately and uses the level of red, green and blue colors to do this. Information input on the writing surface of the Ishikawa electronic blackboard is therefore divided into three parts, namely characters, linear lines and graphics. Colored pens are the tools used to enable the electronic blackboard to perform the above discrimination. Through use of color filters, if red (R) is the predominate color of information input on the writing surface then a character is recognized. If green (G) is the predominate color of information input on the writing surface then a linear line is recognized. If blue (B) is the predominate color of information input on the writing surface then a graphic is recognized.

The Examiner alleges that the “electronic characters and electronic graph[ic]s...are sent to the subsequent character-graph[ic] synthesizing device 20 and simultaneously synthesized with the graph[ic]...thus, a high quality electronic document is created and is output from the output device 21.” From this, the Examiner concludes that everything written on the writing surface of the Ishikawa electronic blackboard is captured and forms part of the output image. Applicants respectfully submit that the Examiner’s conclusion is simply incorrect.

The Ishikawa electronic blackboard only processes red, blue, and green pen strokes on the writing surface that are made using red, blue, and green pen tools. The **output image** of the Ishikawa electronic blackboard therefore does **NOT** include all pen strokes entered on the writing surface that are visible to a human observer looking at the writing surface irrespective of the pen tool used to make the pen strokes or irrespective of pen stroke color. Writing on the Ishikawa electronic

blackboard that is in a color other than red, blue and green that is visible to a human observer looking at the Ishikawa electronic blackboard is not detected by the image channel sensors, is not processed in any manner and thus, does not appear in the Ishikawa output image.

Independent claims 1, 23, 74, and 79 recite that the image data is processed to form an output digital image of the writing surface with the output digital image comprising ***all writing (pen strokes) entered (recorded) on the writing surface that is (are) visible to a human observer looking at the writing surface irrespective of color.*** As the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all writing on the Ishikawa electronic blackboard that is visible to a human observer looking at the Ishikawa electronic backboard irrespective of color. The output images generated by Ishikawa only include red, green and blue writing on the Ishikawa electronic blackboard. Pen strokes in any color other than red, green and blue that are visible to a human observer looking at the Ishikawa electronic blackboard are not processed and as a result do not form part of the Ishikawa output image. Accordingly, contrary to the Examiner's allegations Ishikawa simply does not teach, suggest or disclose the Applicants' invention as defined by these claims or the claims dependent thereon.

Independent claims 42, 51, 56, 62, 68, and 85 recite that the image data is processed to form an output image of the writing surface including ***all pen strokes entered (recorded) on the writing surface that are visible to a human observer looking at the writing surface irrespective of pen tool used to make the***

pen strokes. Again, as the Examiner will appreciate from the discussion above, Ishikawa does not form an output image that includes all pen strokes on the Ishikawa electronic blackboard that are visible to a human observer looking at the Ishikawa electronic backboard irrespective of the pen tool used to make the pen strokes. The output images generated by Ishikawa only include pen strokes entered on the Ishikawa electronic blackboard using red, green and blue pen tools. Pen strokes made using a pen tool of any other color that are visible to a human observer looking at the Ishikawa electronic blackboard are not processed and as a result do not form part of the Ishikawa output image. Accordingly, Ishikawa simply does not teach, suggest or disclose the Applicants' invention as defined by these claims or the claims dependent thereon.

The remaining references fail to overcome the deficiencies of the Ishikawa reference. Accordingly, the claims submitted herewith are believed to distinguish patentably over the cited prior art and should be allowed.

In view of the above amendments and remarks, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 625-3507. All correspondence should continue to be directed to our address given below.

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